

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN RE:

Chapter 9

Case No. 13-53846

City of Detroit, Michigan,

Debtor.

**INTERESTED PARTY DAVID SOLE'S DISCLOSURE OF WITNESSES AND
DOCUMENTS IN ADVANCE OF DECEMBER 17, 2013 HEARING [DOCKET 1864] ON
DEBTOR'S MOTION FOR A FINAL ORDER APPROVING POST-PETITION
FINANCING, GRANTING LIENS AND PROVIDING SUPERPRIORITY CLAIM
STATUS AND MODIFYING AUTOMATIC STAY [DOCKET 1520] AND DEBTOR'S
AMENDED MOTION TO ASSUME OR REJECT EXECUTORY CONTRACT
[DOCKET 157]**

Now comes Interested Party David Sole and discloses the following potential witnesses
and exhibits in connection with the December 17, 2013 hearing on the above motions:

WITNESSES

1. Wallace C. Turbeville, Senior Fellow Demos, former vice president Goldman Sachs,
Municipal Bond Department.
2. Saqib Bhatti (previously disclosed)

EXHIBITS

1. 2009 Swap Agreements
2. LIBOR Rates
3. Orr August 30, 2013 deposition excerpts
4. Barclay Loan terms
5. Barclay commitment letter
6. \$95 million appropriation for "restructuring"
7. Automatic Stay Order

8. Fitch and Standard and Poors at City Council table
9. City Council resolution disapproving Barclay loan
10. City Council resolution calling for SEC investigation
11. Turbeville CV
12. Demos report, The Detroit Bankruptcy, dated November 2013
13. July 2006 POC and Interest Rate Swap documents
14. 2006 POC reflecting no security interest
15. June 2009 Amended POC and Interest Rate Swap documents
16. Libor historical index
17. May 12, 2013 EM Financial Plan
18. July 14, 2013 EM Financial Report to Creditors
19. Bloomberg article on Termination Fees
20. BBC article on UBS Libor rigging
21. Article on ISDA Fix
22. Articles on conviction of UBS executive and indictment of BofA executive
23. Final Judgment on UBS municipal bond rigging/ article on BofA
24. Article on UBS sub-prime lending
25. Senate Select Committee Report on Wall Street and the Financial Crisis
26. Detroit Retirement Fund lawsuit against UBS for mortgage fraud
27. City of Detroit, January 2009 Planning and Development Department Neighborhood Stabilization Program Plan
28. Offering Circular relative to 2006 Certificates of Participation
29. Bhatti CV

Respectfully submitted,

JEROME D. GOLDBERG, PLLC

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